

# Exhibit G

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**From:** Fluskey Jr., Robert J. <RFluskey@hodgsonruss.com>  
**Sent:** Wednesday, June 29, 2022 4:38 PM  
**To:** mccarthy@nywd.uscourts.gov  
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**Subject:** Moog/Skyryse - 22-cv-187

Your Honor:

I write on behalf of Plaintiff Moog, Inc. regarding a housekeeping matter that unfortunately requires the Court's attention in light of the June 30, 2022 deadline to file motions to compel related to written discovery (ECF 164).

Both Skyryse and Moog have indicated that, pursuant to ongoing meet-and-confer correspondence, they will produce documents on or after June 28, either immediately before or after the June 30 deadline to move to compel. For example, Moog re-produced certain documents to Skyryse yesterday to correct a technical issue, and due to the timing of production in connection with the June 30 deadline to move to compel, Moog agreed that Skyryse can have 7 days from the date of production to move to compel on any issues related to the production. Skyryse has also indicated that it has additional documents to produce in connection with written discovery, including source code.

Moog has proposed a reciprocal 7-day extension on motions to compel for both parties from the date of when any such documents are produced. Skyryse has refused to agree to a reciprocal proposal, and has instead advanced the position that only Skyryse receive the extension for the documents Moog produced on June 28.

Moog respectfully requests that the Court permit a reciprocal 7-day extension for all parties to move to compel from the date any documents are produced. This extension will allow the parties to meaningfully evaluate documents produced going forward, and will avoid the need for pre-emptive and unnecessary motion practice. To the extent that the Court is unable to address this issue before tomorrow's deadline, we are prepared to discuss it during the scheduled July 15 conference, or otherwise at the Court's convenience. We wanted to flag the issue now in light of tomorrow's deadline. Moog can also file a formal motion on the issue if the Court prefers.

Thank you for your attention to this matter.

Respectfully,

Rob Fluskey

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